## REMARKS

By the foregoing, minor errors are corrected in specification paragraphs [0005] and [0021]. In addition, the Abstract is revised as required so that it does not exceed 150 words in length.

All claims 1-4 stand rejected under 35 USC § 102 as anticipated by Bunch, "Fundamental Microsoft Jet SQL for Access 2000", Feb. 2000. Reconsideration is requested.

The Examiner's position apparently is that the claimed method for facilitating development and testing of a relational database application program is identically disclosed in the SQL language tutorial authored by Bunch. The Examiner's position is not understood. Thus, the approach the Examiner seems to be taking is based on the premise that the definition or description of a programming language inherently identically discloses any and all programs written in that language. Such is not the case.

The subject method was developed to facilitate development and testing of a relational database application program that uses SQL or a similar language. Fundamentally, Bunch does not even mention the concept of testing, let alone the particular method claimed for testing applications. It is true that the claimed invention employs the features and functions of SOL together with software to achieve testing. It is the testing method to which the claims are directed, not the SQL language nor the operations of the SQL language itself. Significantly, none of the references cited by the Examiner specifically refers to the SQL reserved words CURRENT SQLID and CURRENT USER employed in the exemplary embodiment disclosed in the subject specification, nor do the references refer to testing or testing methods. Development and testing of complex relational database application programs are themselves complex and specialized activities, as is discussed in the "Background of the Invention" section of the subject application, and are distinct from the complexities of a particular database application program itself.

to create a set of records made up of <u>any</u> number of fields or columns (new table)"; pages 6-11, "<u>whole section</u> of Using Data Manipulation Language; pages 11-14, "<u>whole section</u> Using SQL in Access;" and page 9, "Grouping Records in a Result Set, and Inserting Records into a Table." [underlining added]

The underlined words in the quotations of the paragraph above highlight the general nature of the Bunch tutorial in describing the SQL programming language. Entirely absent from the Bunch disclosure is the <u>specific combination</u> of operations recited in applicant's claim 1. At best, Bunch shows that applicant's claimed invention <u>could be</u> implemented in SQL, but that would be a hindsight interpretation, and ignores the fact that Bunch does not even disclose all of the SQL programming language reserved words used in the disclosed embodiment of applicant's invention.

Accordingly, Bunch does not disclose the invention of claim 1 in the identical manner required to support a rejection for anticipation under 35 USC § 102, nor does Bunch render the claimed invention obvious within the meaning of 35 USC § 103. Claim 1 is allowable, and the rejection should be withdrawn.

### Claim 2

Dependent claim 2 calls for:

when development and testing employing Data Manipulation Language statements of the application program have reached a desired stage of completion, for each original database table, removing the Data Definition Language statements which created the corresponding new table and defined the view having the same name and column definitions as the corresponding original database table, such that the application program can access all rows of the original database table without modification of the Data Manipulation Language statements of the application program.

(Again, the underlined passages in particular distinguish over Bunch.)

With reference to claim 2, the Examiner refers to Bunch pages 11-14, "whole section Using SQL in Access;" and pages 10-11, "Updating Records in a Table, and Deleting Records from a Table."

Once again, entirely absent from the Bunch disclosure is the specific combination of operations recited in applicant's claim 2. At best, Bunch shows that applicant's claimed invention could be implemented in SQL, but even that is a stretch. Thus, the discussion in Bunch of "Updating Records in a Table, and Deleting Records from a Table" does not disclose anything like the claimed "removing the Data Definition Language statements which created the corresponding new table and defined the view."

Moreover, any such application of Bunch would be a hindsight interpretation.

Accordingly, Bunch does not disclose the invention of claim 2 in the identical manner required to support a rejection for anticipation under 35 USC § 102, nor does Bunch render the claimed invention obvious within the meaning of 35 USC § 103. Claim 2 is allowable on the basis of its own recitations, as well as on the basis of its dependency from allowable claim 1.

#### Claim 3

Dependent claim 3 calls for:

when development and testing employing Data Manipulation Language statements of the application program have reached a desired stage of completion, for each original database table, modifying the Data Definition Language statements which created the corresponding new table and defined the view having the same name and column definitions as the corresponding original database table by removing all reference to the User Identification such that access to the view is not limited to rows in the new Table where the User Identification matches a particular user entity, and such that the application program can access through the view all rows of the original database table without modification of the Data Manipulation Language statements of the application program.

(Again, the underlined passages in particular distinguish over Bunch.)

With reference to claim 3, the Examiner refers to Bunch page 6, "Retrieving Records;" and pages 11-12, "Using SQL in Access."

As in the case of claims 1 and 2, above, entirely absent from the Bunch disclosure is the specific combination of operations recited in applicant's claim 3. At best, Bunch shows that applicant's claimed invention could be implemented in SQL, but even that is a stretch. Thus, the discussion in Bunch of "Using SQL in Access." does not disclose anything like the claimed "modifying the Data Definition Language statements ... by removing all reference to the User Identification such that access to the view is not limited to rows in the new Table where the User Identification matches a particular user entity, and such that the application program can access through the view all rows of the original database table without modification of the Data Manipulation Language statements of the application program." Moreover, any such application of Bunch would be a hindsight interpretation.

Accordingly, Bunch does not disclose the invention of claim 3 in the identical manner required to support a rejection for anticipation under 35 USC § 102, nor does Bunch render the claimed invention obvious within the meaning of 35 USC § 103. Claim 3 is allowable on the basis of its own recitations, as well as on the basis of its dependency from allowable claim 1.

# Claim 4

Dependent claim 4 further recites:

the database management system creates an authorization identification for each user entity logging on; wherein

during the step of employing Data Definition Language statements at least a first time to create a corresponding new table, the additional column is defined as NOT NULL and to contain the authorization identification as a default value; and wherein

the database management system, when a statement to INSERT a row accesses a view derived from a table, stores defined default values in any columns of the row which are present in the table from which the view is derived but which are missing from the view.

With reference to claim 4, the Examiner refers to Bunch pages 9-10, "Inserting Records into a Table."

As in the case of claims 1, 2 and 3, above, entirely absent from the Bunch disclosure is the specific combination of operations recited in applicant's claim 4. At best, Bunch shows that applicant's claimed invention could be implemented in SQL, but even that is a stretch. Thus, the discussion in Bunch of "Using SOL in Access." does not disclose anything like the claimed "during the step of employing Data Definition Language statements at least a first time to create a corresponding new table, the additional column is defined as NOT NULL and to contain the authorization identification as a default value; and wherein the database management system, when a statement to INSERT a row accesses a view derived from a table, stores defined default values in any columns of the row which are present in the table from which the view is derived but which are missing from the view." Moreover, any such application of Bunch would be a hindsight interpretation.

Accordingly, Bunch does not disclose the invention of claim 4 in the identical manner required to support a rejection for anticipation under 35 USC § 102, nor does Bunch render the claimed invention obvious within the meaning of 35 USC § 103. Claim 4 is allowable on the basis of its own recitations, as well as on the basis of its dependency from allowable claim 1.

# Conclusion

In view of the foregoing, reconsideration and allowance are requested. Claims 1-4 are in the case.

Docket No. SSI-1

Respectfully submitted,

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